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December 22, 2017

By CM/ECF

The Honorable Michael A. Hammer, U.S.M.J.
Martin Luther King Building & U.S. Courthouse
50 Walnut Street, Room MLK2C
Newark, NJ 07101

Re: WAG v. Sobonito et al. (Civil Action No. 14-cv-01661) (ES)(MAH)

Dear Judge Hammer:

We represent Defendant Coolvision Ltd. ("Coolvision") in the above-captioned matter. We respectfully submit this letter jointly on behalf of Coolvision and Plaintiff WAG Acquisition, L.L.C. ("WAG") to request a brief extension of time for Coolvision to respond to deposition questions submitted pursuant to Rule 31 of the Federal Rules of Civil Procedure.

In its Order dated November 21, 2017, the Court ordered that (1) WAG is permitted to take the Rule 30(b)(6) deposition of Coolvision by written question in accordance with Rule 31(a)(4); (2) WAG shall serve a copy of the questions under Rule 31(b) on counsel for Coolvision on or before December 14, 2017; and (3) Coolvision shall respond to those questions pursuant to Rule 31 on or before January 14, 2018. (ECF No. 123.)

Pursuant to the Order, WAG served its questions on counsel for Coolvision on December 14, 2017. Due to logistical issues involved with bringing a Coolvision witness from Israel, Coolvision and WAG jointly request an extension of the deadline for Coolvision to respond to the questions to January 22, 2018.

We thank the Court for its consideration and assistance in this matter.

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Respectfully yours,

/s/ Geoffrey W. Castello

Geoffrey W. Castello

cc: Counsel of record (by electronic mail)